

RONALD SULLIVAN LAW, PLLC

Ronald S. Sullivan Jr.

July 28, 2024

By ECF

The Honorable Vera M. Scanlon  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Carlos Watson and Ozy Media, Inc.  
Criminal Docket No. 23-82 (EK)

Dear Judge Scanlon:

We write to put all the relevant documents in context in an effort to aid your review. You have received many, if not most, in piecemeal fashion, but we endeavor to put everything in one place for your convenience. We await a few documents that will arrive on Monday. We will supplement this document at that time. The exhibit package will be sent via email as it contains personal identifying information and banking information of several individuals.

**1. Enhanced \$3M Package** -- Per our discussion, we have trebled the package.

**\$2M Pledged by Multiple Sureties** -- It includes \$2M surety spread across 3 relatives of Mr. Watson who know him well. They are his sisters Beverly Watson (a lawyer) and Dr. Carolyn Watson (a therapist), and his cousin, Michelle Watson (a county clerk). Both sisters were interviewed by prosecutors on Friday, and we believe his cousin will be contacted on Monday.

**\$1M Additional Bail Package** -- We have also put together a \$1M package, secured by assets, including 42 acres of family land in Virginia (Gloucester County) that was conservatively valued at \$750K.

- **Virginia Parcel Valuation Supporting Documentation (\$750K+) –** Attached as **Exhibit A** are market comparisons for similar land plots in the area. The values of these properties range from \$700K to

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\$4.5M. Recall, this land has produced revenue in the last decades via timber fees.

- o **Virginia Parcel Ownership Affidavit and Pledge** – We attach a Real Estate Affidavit/ List of Heirs that documents ownership of the 42.13 acre parcel by Dr. Rose Watson’s (Carlos Watson’s mother) 5 remaining living siblings plus the heirs of the two siblings who are deceased, including Dr. Rose Watson. Please see attached as **Exhibit B** - The List of Heirs/Real Estate Affidavit. The List of Heirs/ Real Estate Affidavit is listed under the Code of Virginia as a means to transfer land title and is used by Gloucester County Clerk’s office (see Title 64.2. Wills, Trusts, and Fiduciaries, Chapter 5, Article 2. List of Heirs and Affidavit of Real Estate § 64.2-509. List of heirs.) Each of the other 6 parties have agreed to sign a power of attorney, allowing their niece/cousin Beverly Watson to sign on behalf of the group their agreement to put up the land as part of the enhanced bail package. The ownership group was on the phone line on Friday and we expect them to join again on Monday. Please see attached **Exhibit C**- three powers of attorney in favor of Beverly Watson, plus one additional power of attorney from James Arond-Thomas to Manya Arond-Thomas, who will ultimately sign power of attorney for Beverly Watson. The remaining powers of attorney will be sent separately.
- o **Additional \$250K in Commitments across 3 Pledges:** In addition to the \$750K Virginia land parcel, we also have included: 403-b retirement account (\$100K); Washington, D.C. condo (\$100K); Massachusetts home (\$50K). Please see the attached back up for each, as **Exhibit D** – affidavit of 403B approval; **Exhibit E**- D.C. Condo mortgage statement and Zillow; **Exhibit F**- Massachusetts home mortgage statement and Zillow.

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Let us know if you need anything else. The outstanding documents should be in tomorrow morning.

Respectfully submitted,

**RONALD SULLIVAN LAW PLLC**

/s/

Ronald S. Sullivan Jr., Esq.

Janine Gilbert, Esq.

*Counsel for Carlos Watson*

**Exhibits**

1. **Exhibit A-** Virginia Valuation Back Up
2. **Exhibit B-** List of Heirs/Real Estate Affidavit
3. **Exhibit C-** Powers of Attorney
4. **Exhibit D-** Michelle Watson affidavit -- 403B approval
5. **Exhibit E-** D.C. Condo mortgage statement + Zillow
6. **Exhibit F-** Massachusetts home mortgage statement + Zillow